

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Kathy Henley Hill
Michael Everette Hill, Debtors**

**Case No. 24-02704-JAW
CHAPTER 13**

NOTICE

The undersigned counsel for Debtors have filed papers with the court to approve attorney's compensation.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the Application, or if you want the court to consider your views on the Application, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Thad Cochran United States Courthouse
501 E. Court St., Ste 2.300
Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to the Debtors' attorney:

The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Application and may enter an order granting that relief, which shall sustain this Application for Compensation.

Date: May 20, 2025

Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
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Jackson, MS 39236
601-500-5533
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Kathy Henley Hill
Michael Everette Hill, Debtors**

**Case No. 24-02704-JAW
CHAPTER 13**

**SECOND APPLICATION FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF NECESSARY EXPENSES
FOR THOMAS C. ROLLINS, JR.**

COMES NOW, Thomas C. Rollins, Jr., (the “Applicant”) attorney for the Debtors, and files this *Second Application for Allowance of Compensation and Reimbursement of Necessary Expenses for Thomas C. Rollins, Jr.* and in support thereof, would respectfully show to this Honorable Court as follows, to-wit:

1. On November 18, 2024, Debtors filed a bankruptcy petition under Chapter 13 of the bankruptcy code.

FEE AGREEMENT

2. The Debtors and Thomas C. Rollins, Jr. of The Rollins Law Firm, PLLC (hereinafter “the firm”), have agreed to an hourly billing arrangement in lieu of this Court’s standard “no look” fee award. Per said agreement, attorney T.C. Rollins is billed at a rate of \$360.00 per hour while attorney Jennifer Calvillo is billed at a rate of \$360.00 per hour. Paralegals are billed at a rate of \$155.00 per hour. Legal Assistants bill at \$100.00 per hour. Said rates are reasonable and in keeping with community custom and standards for attorneys in this area.
3. Throughout its representation of the Debtors herein, Applicant has maintained itemized billing entries which are completed and maintained contemporaneously with the associated service(s) provided.

RETAINER

4. The Debtors herein did not provide a retainer.

FEES PAID TO DATE

5. The Court previously approved interim compensation in the amount of \$2,687.37 (Dk # 26).
6. The trustee has disbursed \$2,687.37 on this claim as of May 14, 2025.

ADDITIONAL FEES REQUESTED

7. The time incurred and services provided by the firm since the filing of the previous fee application have resulted in Attorney's fees in the amount of \$1,075.50 and expenses in the amount of \$158.40 for a total of \$1,233.90. A detailed accounting of which is attached hereto as Exhibit "A".
8. This is the Applicants' second request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from December 18, 2024 to May 14, 2025.

TOTAL FEES FOR SECOND APPROVAL

9. The time incurred and services provided by the firm during the pendency of this case have resulted in Attorney's fees in the amount of \$ 3,725.50 and expenses in the amount of \$195.78 for a total of \$3,921.28. A detailed accounting is attached hereto as Exhibit "B".

A. LODESTAR ANALYSIS

1. The prevailing hourly rate in the community under § 330

The Applicant requests fees based on the following hourly rates: \$360.00 for attorneys, \$155.00 for paralegals, and \$100.00 for legal assistants.

The hourly rates for attorneys with similar skills and experience as consumer bankruptcy attorneys can vary widely, typically ranging from \$200 to \$450 per hour. Due to the specialized nature of bankruptcy law, many attorneys are not proficient in this field. However, with 14 years of experience, approximately 4,000 bankruptcy cases filed, board certification in consumer bankruptcy law, and a strong community reputation, Thomas Rollins is well-qualified to command fees at the higher end of this range. Similarly, Jennifer Calvillo, who has 12 years of experience with the same firm, having worked on 90% of those 4,000 cases, holds board certification in consumer bankruptcy law, is highly regarded in the community, and is a partner in her firm, is equally positioned to charge at the upper end of this spectrum. The Applicants' paraprofessionals charge a blended rate of \$127.50 per hour, which is within the reasonable range for paraprofessional services.

2. Reasonable hours expended

While Chapter 11 lawyers may only be compensated for reasonable time expended that produce a material benefit to the estate, § 330(a)(B) provides that a chapter 13 debtor's attorney can be awarded reasonable compensation for representing the interests of the debtor, based on the benefit and necessity of such services to the debtor and the other factors found in § 330.

The services provided to the Debtor and the expenses incurred by the Applicant were essential for administering the bankruptcy case, safeguarding the Debtor's rights, and fulfilling the Applicant's obligations under the Bankruptcy Code.

An itemization of time is attached as Exhibit "B" and an affidavit of Applicant is attached as Exhibit "C".

3. Lodestar calculation

The lodestar amount for the Applicant's attorneys is \$2,232.00, reflecting 7 hours at an hourly rate of \$318.86.

For the Applicant's paraprofessionals, the lodestar amount is \$1,493.50, based on 11.9 hours at a blended rate of \$125.50 per hour.

Together, the total lodestar amount is \$3,725.50, representing a combined total of 18.9 hours at a blended rate of \$197.12 per hour.

B. ADJUSTMENTS TO LODESTAR

After determining the appropriate lodestar amount, the Court must decide whether the application of the § 330 factors and the Johnson factors warrant upward or downward adjustment.

1. § 330 Factors

The following § 330 factors were already discussed when determining the lodestar amount:

- (A) The time spent on such services;
- (B) The rates charged for such services;
- (C) Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

The remaining § 330 factors are discussed **below**:

- (D) Whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of a case under this title;
 - a. The services provided to the Debtor and the expenses incurred by the Applicant were essential for administering the bankruptcy case, safeguarding the Debtor's rights, and fulfilling the Applicant's obligations under the Bankruptcy Code.
 - b. No adjustment is warranted.

(E) Whether the services were performed within a reasonable amount of time

commensurate with the complexity, importance, and nature of the problem, issue or task addressed;

- a. The Applicant did not devote excessive time to drafting schedules, pleadings, or conducting research. A significant amount of time was spent investigating the Debtor's financial situation and gathering the necessary documents for submission to the Trustee. This work was efficiently handled by legal assistants, who billed at \$100.00 per hour.
- b. No adjustment is warranted.

(F) With respect to a professional person, whether the person is board certified or

otherwise has demonstrated skill and experience in the bankruptcy field; and

- a. Both Thomas Rollins and Jennifer Calvillo are board-certified in consumer bankruptcy law by the American Board of Certification. In Mississippi, only five bankruptcy practitioners hold this certification, with three based in the state. Of these, two are with the Applicant's firm.
- b. The Applicant's extensive experience has already been addressed in the lodestar analysis.
- c. This factor was taken into account when setting the Applicant's hourly rate, but otherwise supports an upward adjustment.

2. Johnson Factors

The following *Johnson* factors were already discussed when determining the lodestar amount:

1. The time and labor required.
2. The novelty and difficulty of the questions presented.
3. The skill required to perform the legal services properly.
4. The customary fee in the community.
5. Whether the fee is fixed or contingent.
6. The experience, reputation, and ability of the attorneys.

The remaining *Johnson* factors are discussed **below**:

7. The preclusion of other employment by the attorney due to acceptance of the case.
 - a. Not Applicable.
 - b. No adjustment is warranted.
8. Time limitations imposed by the client or circumstances.
 - a. Not Applicable
 - b. No adjustment is warranted.
9. The amount involved and the results obtained.
 - a. This factor was already discussed in the § 330 analysis (Whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of a case under this title;)
 - b. No adjustment is warranted.
 - c.
10. The undesirability of the case.
 - a. While this case is no less desirable than other chapter 13 cases, when compared to the broader legal community chapter 13 cases have many elements that make them very undesirable.
 - b. **Client Non-Cooperation:** Debtors in Chapter 13 cases may have difficulty gathering the necessary financial documentation or adhering to the repayment plan, which increases the attorney's workload and the chances of case dismissal.
 - c. **Length of the Process:** Chapter 13 cases typically last 5 years, which may lead to diminished client interest and requires attorneys to remain vigilant for potential issues throughout the repayment period. Few practice areas demand such a long-term commitment, where a lawyer must predict an appropriate fee upfront. While some bankruptcy cases are confirmed and proceed smoothly, most require substantial additional work post-confirmation, including handling Motions to Dismiss or Motions for Relief.
 - d. **Risk of Dismissal:** If the debtor fails to make payments or meet other requirements of the repayment plan, the case may be dismissed, and the attorney may not be compensated for all of the work completed. Chapter 13 practitioners collect a shockingly low percentage of allowed fees in chapter 13 cases.
 - e. This factor weighs in favor of an upward adjustment.
11. The nature and length of the professional relationship with the client.
 - a. Applicant had no prior professional relationship with the client prior to their engagement in this matter.
 - b. No adjustment is warranted.
12. Awards in similar cases

- a. The “market rate” of \$4,000.00 is a distorted figure, as attorneys are pressured to accept it to avoid the burdensome fee application process, rather than reflecting a true market rate.
- b. Under § 330(a)(3)(F), the Court is instructed to compensate bankruptcy attorneys at a rate comparable to that of similarly skilled and experienced **non-bankruptcy attorneys**.
- c. This is only one of the twelve Johnson factors. If the Court determines that a downward adjustment is warranted, this factor should be considered alongside the other § 330 and Johnson factors which favor an upward adjustment of the lodestar.
- d. Market rates have been addressed in the lodestar analysis, and no additional adjustment is necessary.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that this Court enter an Order awarding reasonable attorneys’ fees for the professional services rendered herein and authorizing and directing Debtors to pay said attorneys’ fees and expenses. Applicants pray for general relief.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Application for Compensation was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

KATHY HENLEY HILL
MICHAEL EVERETTE HILL

CASE NO: 24-02704-JAW

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 5/21/2025, I did cause a copy of the following documents, described below,

Notice and Application for Compensation

Exhibit A Invoice

Exhibit B Accounting

Exhibit C Affidavit

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 5/21/2025

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.

Attorney at Law

The Rollins Law Firm

702 W. Pine Street

Hattiesburg, MS 39401

601 500 5533

trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

KATHY HENLEY HILL
MICHAEL EVERETTE HILL

CASE NO: 24-02704-JAW

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 5/21/2025, a copy of the following documents, described below,

Notice and Application for Compensation

Exhibit A Invoice

Exhibit B Accounting

Exhibit C Affidavit

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 5/21/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 24-02704-JAW
SOUTHERN DISTRICT OF MISSISSIPPI
TUE MAY 20 13-22-47 PST 2025

ECMC
PO BOX 16408
ST PAUL MN 55116-0408

FLAGSTAR BANK NA
5151 CORPORATE DRIVE
TROY MI 48098-2639

(P)KHEAA
ATTN MILES F JUSTICE
100 AIRPORT RD
FRANKFORT KY 40601-6161

LAKEVIEW LOAN SERVICING LLC
5151 CORPORATE DRIVE
TROY MI 48098-2639

LAKEVIEW LOAN SERVICING LLC CO M T
BANK
PO BOX 840
BUFFALO NY 14240-0840

QUANTUM3 GROUP LLC AS AGENT FOR
SADINO FUNDING LLC
PO BOX 788
KIRKLAND WA 98083-0788

~~EXCLUDE~~

~~US BANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET
SUITE 2300
JACKSON MS 39201-5036~~

1ST FRANKLIN
398 HIGHWAY 51
RIDGELAND MS 39157-3401

1ST FRANKLIN FINANCIAL CORPORATION
ATTN ADMIN SERVICES
PO BOX 880
TOCCOA GA 30577-0880

A1
5319 I55 N FRONTAGE RD
JACKSON MS 39206

ACCOUNTS RECEIVABLE MA
PO BOX 638
PARIS TN 38242-0638

AFFIRM INC
ATTN BANKRUPTCY
650 CALIFORNIA ST
SAN FRANCISCO CA 94108-2716

AFFIRM INC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

ALLY BANK
RESURGENT CAPITAL SERVICES
PO BOX 10368
GREENVILLE SC 29603-0368

ALLY CREDIT CARD CWS
PO BOX 9222
OLD BETHPAGE NY 11804-9222

ARMSTRONG ASSOCIATES
208 ADAMS ST
MOBILE AL 36603-6598

ASHLEY FUNDING SERVICES LLC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

BANK OF AMERICA
ATTN BANKRUPTCY
4909 SAVARESE CIRCLE
TAMPA FL 33634-2413

BANK OF AMERICA NA
PO BOX 673033
DALLAS TX 75267-3033

BAPTIST MEDICAL GROUP
PO BOX 74533
ATLANTA GA 30384-5333

BEST EGG
ATTN BANKRUPTCY
PO BOX 42912
PHILADELPHIA PA 19101-2912

CHRISTINA JENNINGS
502 CREEKSTONE DR
BRANDON MS 39047-5050

COMENITYBIG LOTS
ATTN BANKRUPTCY DEPT
PO BOX 182125
COLUMBUS OH 43218-2125

CONCORA CREDIT
PO BOX 4499
BEAVERTON OR 97076-4499

COVINGTON CREDIT
ATTN BANKRUPTCY
PO BOX 1947
GREENVILLE SC 29602-1947

CREDIT ONE BANK
6801 CIMARRON RD
LAS VEGAS NV 89113-2273

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Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

~~EXCLUDE~~

DEPARTMENT OF TREASURY INTERNAL
REVENUE SE
PO BOX 7346
PHILADELPHIA PA 19101-7346

~~(D) EGMG
POST OFFICE BOX 16408
ST PAUL MN 55116-0408~~

FLAGSHIP CREDIT ACCEPTANCE
PO BOX 3807
COPPELL TX 75019-5877

FIRST CONSUMER FINANCI
211 WOODGATE DR
STE B
BRANDON MS 39042-2757

FIRST HERITAGE
101 N MAIN ST STE 600
GREENVILLE SOUTH CAROLINA 29601-4846

FLAGSHIP CREDIT
ATTN BANKRUPTCY
PO BOX 965
CHADDS FORD PA 19317-0643

FLAGSTAR BANK
ATTN BANKRUPTCY
5151 CORPORATE DRIVE
TROY MI 48098-2639

GENESIS FS CARD
ATTN BANKRUPTCY
PO BOX 4477
BEAVERTON OR 97076-4401

INTERNAL REVENUE SERVI
CO US ATTORNEY
501 EAST COURT ST
STE 4430
JACKSON MS 39201-5025

~~EXCLUDE~~

(P) JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

~~(D) (P) KHEAA
ATTN MILES F JUSTICE
100 AIRPORT RD
FRANKFORT KY 40601-6161~~

KATHRYN ALLEY LACHOWSKYKHAN
WILSON ASSOCIATES PLLC
FOR FLAGSTAR BANK NA
400 WEST CAPITOL AVE SUITE 1400
LITTLE ROCK AR 72201-3562

LVNV FUNDING LLC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

LAKEVIEW LOAN SERVICING LLC
CO M T BANK
PO BOX 840
BUFFALO NY 14240-0840

LAKEVIEW LOAN SERVICING LLC
FLAGSTAR BANK NA
5151 CORPORATE DRIVE
TROY MI 48098-2639

(P) MT BANK
LEGAL DOCUMENT PROCESSING
626 COMMERCE DRIVE
AMHERST NY 14228-2307

(P) MOHELA
CLAIMS DEPARTMENT
633 SPIRIT DRIVE
CHESTERFIELD MO 63005-1243

MOHELA ON BEHALF OF NSLP
1300 O STREET
LINCOLN NE 68508-1511

(P) ASCENDIUM EDUCATION SOLUTIONS INC
38 BUTTONWOOD COURT
MADISON WI 53718-2156

MERCURYFBT
ATTN BANKRUPTCY
PO BOX 84064
COLUMBUS GA 31908-4064

~~EXCLUDE~~

~~(D) (P) MOHELA
CLAIMS DEPARTMENT
633 SPIRIT DRIVE
CHESTERFIELD MO 63005-1243~~

NELNET
PO BOX 82561
LINCOLN NE 68501-2561

(P) PENTAGON FEDERAL CREDIT UNION
ATTN BANKRUPTCY DEPARTMENT
P O BOX 1432
ALEXANDRIA VA 22313-1432

QUANTUM3 GROUP LLC AS AGENT FOR
COMENITY CAPITAL BANK
PO BOX 788
KIRKLAND WA 98083-0788

QUANTUM3 GROUP LLC AS AGENT FOR
CONCORA CREDIT INC
PO BOX 788
KIRKLAND WA 98083-0788

QUANTUM3 GROUP LLC AS AGENT FOR
MERCURY FINANCIAL FIRST BANK TRUST
PO BOX 788
KIRKLAND WA 98083-0788

~~EXCLUDE~~

~~(D) QUANTUM3 GROUP LLC AS AGENT FOR
CONCORA CREDIT INC
PO BOX 788
KIRKLAND WA 98083-0788~~

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

~~EXCLUDE~~

(P)REPUBLIC FINANCE LLC
282 TOWER RD
PONCHATOULA LA 70454-8318

~~(D) (P)REPUBLIC FINANCE LLC
282 TOWER RD
PONCHATOULA LA 70454-8318~~

SYNCHRONY
ATTN BANKRUPTCY
PO BOX 955060
ORLANDO FL 32896-5060

US DEPARTMENT OF EDUCATION CO NELNET
121 S 13TH ST
LINCOLN NE 68508-1904

US ATTORNEY GENERAL
US DEPT OF JUSTICE
950 PENNSYLVANIA AVENW
WASHINGTON DC 20530-0001

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE C 430
JACKSON MS 39201-5022~~

UNIVERSITY OF ARKANSAS
PO BOX 504962
SAINT LOUIS MO 63150-4962

VERIZON
BY AIS INFOSOURCE LP AS AGENT
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

DEBTOR

KATHY HENLEY HILL
502 CREEKSTONE DR
BRANDON MS 39047-5050

MICHAEL EVERETTE HILL
502 CREEKSTONE DR
BRANDON MS 39047-5050

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767~~

~~EXCLUDE~~

~~TORRI PARKER MARTIN
TORRI PARKER MARTIN CHAPTER 13
BANKRUPT
200 NORTH CONGRESS STREET STE 400
JACKSON MS 39201-1902~~